

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE**

UNIVERSITY OF TENNESSEE RESEARCH)
FOUNDATION and SAINT MATTHEW)
RESEARCH, LLC,)

Plaintiffs,

v.

AMAZON.COM, INC. and AMAZON WEB)
SERVICES, INC.)

Defendants.

Civil Action No. 3:17-cv-00181-HSM-CCS

CONFIDENTIAL

**FILED UNDER SEAL PURSUANT
TO PROTECTIVE ORDER**

**DECLARATION OF BO THOMAS IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS OR TRANSFER FOR IMPROPER VENUE**

I, Bo Thomas, declare as follows:

1. I am a Senior Manager for the Amazon Web Services Human Resources Business Information team. I am employed by Amazon Corporate LLC. I make this declaration in support of Defendants' Motion to Dismiss or Transfer for Improper Venue. The facts set forth herein are based on my personal knowledge following a reasonable investigation and, if called upon to testify, I could and would competently testify thereto.

2. Amazon.com, Inc., has no employees who live or work in the Eastern District of Tennessee.


3. Amazon Web Services, Inc. ("AWS") employs thousands of employees in the United States alone. According to AWS's records, only four of those employees have home addresses in the Eastern District of Tennessee.

4. I have communicated with those four employees and they have indicated that, while they work from home and occasionally visit customer sites, neither they, nor any Amazon entity,

hold out their home or those customer sites as an Amazon or AWS place of business. Their homes are not listed as related to Amazon in public signs, directory listings, or otherwise.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 28, 2017


Bo Thomas